

**EXHIBIT E TO  
SHAVER DECLARATION IN  
SUPPORT OF PLAINTIFFS'  
SUPPLEMENTAL MOTION FOR  
CLASS CERTIFICATION  
[ECF NO. 456]  
REDACTED VERSION**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH TECH EMPLOYEE )  
ANTITRUST LITIGATION )  
 ) No. 11 CV 2509 LHK  
THIS DOCUMENT RELATES TO: )  
ALL ACTIONS. )  
\_\_\_\_\_ )

ATTORNEYS' EYES ONLY HIGHLY CONFIDENTIAL

VIDEO DEPOSITION OF ARNNON GESHURI

AUGUST 17, 2012

Reported by: Rosalie A. Kramm, CSR No. 5469, CRR

10:15:35 1 fill that job through the various methods that you come  
10:15:37 2 up with, it's up to that recruiter to get it done.

10:15:42 3 Q. And those methods included sourcing, correct?

10:15:46 4 A. Those methods included sourcing.

10:15:50 5 Q. Do you have any idea in terms of breakdown by  
10:15:54 6 time what proportion of time that the recruiting  
10:15:59 7 organization spent on the sourcing part of it in terms of  
10:16:03 8 relying on that sourcing method.

10:16:05 9 MR. RUBIN: You're saying in terms of person  
10:16:07 10 hours?

10:16:08 11 MR. HARVEY: Yes.

10:16:12 12 THE WITNESS: I I I so I'm not quite  
10:16:14 13 sure how it's broken down. I would I would the  
10:16:18 14 recruiters one of the things that I mentioned before  
10:16:21 15 is that we had over 2 million applications that came in,  
10:16:26 16 and a recruiter's pipeline was pretty full. So their  
10:16:33 17 responsibility was to get through that pipeline the  
10:16:35 18 majority of the time, and and whether that came from  
10:16:37 19 the employee referral program or through the extranet  
10:16:42 20 website so I don't know the exact breakdown.

10:16:46 21 BY MR. HARVEY:

10:16:47 22 Q. But the primary responsibility of a recruiter  
10:16:50 23 is to find good people, correct?

10:16:52 24 A. The primary responsibility is to find good  
10:16:54 25 people that will fit the roles within the company, the

10:16:58 1 company's needs at the time.

10:16:59 2 Q. And so okay. That's fine.

10:17:16 3 And the recruiting organization, I believe you  
10:17:19 4 said that when you were hired, there were 40 people in  
10:17:22 5 this organization, and when you left, there were  
10:17:24 6 approximately 900, correct?

10:17:27 7 A. Not exactly. So during the heyday, or as we  
10:17:32 8 ramped up, we we hit around 850, 900 staffing  
10:17:37 9 professionals in the company. But when I left, it was a  
10:17:41 10 different number, which I don't I don't know, because  
10:17:43 11 I was out of that role when I left the company.

10:17:46 12 So so basically but during its most  
10:17:49 13 prolific time, it was around 900 people.

10:17:53 14 Q. And what years fell into this prolific period?

10:17:57 15 A. It was probably the well, it wasn't  
10:17:59 16 immediate, because I had to build up to that. So it was  
10:18:02 17 probably maybe my second or third year there, those  
10:18:06 18 are the two the two years.

10:18:08 19 Q. So 2005, 2006?

10:18:10 20 A. This was yeah, and I think that was parallel  
10:18:14 21 to the growth of the company. We can look at the  
10:18:16 22 headcount numbers of the company, but you can see how it  
10:18:19 23 was a pretty big spike in growth.

10:18:21 24 Q. Sure. And let's see.

10:18:24 25 When you became the director of HR, I take it

10:18:29 1 in approximately the beginning of 2009, roughly how many  
10:18:32 2 people worked in the recruiting organization?

10:18:36 3 A. I I don't I actually don't recall.

10:18:39 4 Q. Was it more than 500?

10:18:41 5 A. Yeah, I I don't I don't recall. It was  
10:18:43 6 in the hundreds, but I don't I don't recall the exact  
10:18:46 7 number when I left.

10:18:52 8 Q. Did you rely exclusively on Google employees as  
10:18:55 9 part of this recruiting function, or did you also  
10:18:57 10 occasionally rely on third party recruiters?

10:19:01 11 MR. RUBIN: Objection. Vague as to "third  
10:19:03 12 parties."

10:19:04 13 THE WITNESS: Describe third party recruiters  
10:19:06 14 to me, if you don't mind.

10:19:08 15 BY MR. HARVEY:

10:19:08 16 Q. Anyone who would recruit on Google's behalf who  
10:19:12 17 was not on Google's direct payroll.

10:19:14 18 MR. RUBIN: Same objection.

10:19:16 19 THE WITNESS: So we so from my from  
10:19:22 20 how we structure the organization, just really briefly,  
10:19:27 21 is that for very senior level hires, we on occasion would  
10:19:32 22 use a search firm that would help us to find very senior  
10:19:36 23 people.

10:19:38 24 BY MR. HARVEY:

10:19:40 25 Q. Would you use well, were there any other

10:22:57 1 and utilize, and that was that was how they structured  
10:23:03 2 their organization.

10:23:05 3 Q. And how many individuals worked in the sourcing  
10:23:08 4 team when you were first hired at Google?

10:23:11 5 A. There were if I recall correctly, there were  
10:23:14 6 [REDACTED] at the time. It was just [REDACTED] recruiters when I first  
10:23:18 7 started. [REDACTED].

10:23:20 8 Q. And then how did you grow the sourcing team  
10:23:23 9 during your time at Google?

10:23:25 10 MR. RUBIN: Objection. Vague.

10:23:27 11 THE WITNESS: So my responsibility was to build  
10:23:32 12 the infrastructure for a successful group. I focused on  
10:23:36 13 building recruiters and making sure we had enough volume  
10:23:40 14 recruiters to handle the influx of applicants.

10:23:44 15 And then as a need came up where we needed to  
10:23:47 16 find diamonds in the rough, great candidates, I created a  
10:23:53 17 team of folks doing research in finding excellent talent.

10:23:58 18 BY MR. HARVEY:

10:23:58 19 Q. And what was the first hire for the sourcing  
10:24:00 20 team I'm sorry. When was the first hire?

10:24:03 21 A. I I don't I don't recall. Honestly,  
10:24:06 22 again, I don't remember exactly when I first hired a  
10:24:08 23 sourcer. Yeah. I don't I don't recall. I can't  
10:24:12 24 answer. I don't know exactly when. It was a it  
10:24:15 25 was I don't know when.

10:24:18 1 Q. Do you remember whether it was in 2004 or 2005?

10:24:23 2 MR. RUBIN: Objection. Calls for speculation.

10:24:24 3 THE WITNESS: Yeah, I still don't remember  
10:24:25 4 exactly when we hired the first sourcer. It's just not  
10:24:28 5 specific to me. I can't remember.

10:24:30 6 BY MR. HARVEY:

10:24:30 7 Q. How many people worked in sourcing when it was  
10:24:33 8 at its largest size?

10:24:36 9 A. I I probably had of order of magnitude,  
10:24:44 10 probably [REDACTED] people doing sourcing, out of a team of  
10:24:48 11 900.

10:24:49 12 Q. Oh, so you're including that within the 900?

10:24:53 13 A. Yeah.

10:24:53 14 Q. In terms of

10:24:53 15 A. I said that before I mentioned 900 staffing  
10:24:55 16 overall.

10:24:56 17 Q. I see. Thank you.

10:25:09 18 And then moving on to your final role at  
10:25:11 19 Google, when you were director of HR, could you could  
10:25:18 20 you kind of describe categories of responsibilities you  
10:25:22 21 had in that role.

10:25:24 22 A. Yeah. I I was basically responsible for  
10:25:29 23 for a specific area within within the engineering  
10:25:32 24 organization to support the employee base. So that means  
10:25:35 25 that I handled employee relations issues. I helped to

10:25:44 1 deal with, you know, personal or like ergonomic  
10:25:50 2 issues, when people had problems with their work space,  
10:25:53 3 or if they had medical problems how they got on  
10:25:55 4 disability and things like that. So I basically just  
10:25:57 5 handled a variety of employee issues to help to help  
10:26:01 6 those groups function within the work environment.

10:26:12 7 Q. And did you have any other responsibilities  
10:26:14 8 while you were in HR, aside from the ones that you  
10:26:18 9 described?

10:26:18 10 A. There was a variety whatever it was there  
10:26:19 11 was a variety of roles, but it all focused on Dean, it  
10:26:23 12 all focused on the the interaction of employees, you  
10:26:28 13 know, if managers had a low performer, helping them walk  
10:26:31 14 through that, how to how to help that employee get  
10:26:35 15 better or whatever else we need to do. So that so  
10:26:38 16 basically I was I was responsible for helping managers  
10:26:41 17 and employees just deal with the work environment. But  
10:26:44 18 the issues were pretty varied, and I just helped to  
10:26:47 19 helped them to make it through the make it through and  
10:26:50 20 be a better better person as an outcome.

10:27:37 21 MR. HARVEY: I believe this is Exhibit 170. If  
10:27:38 22 you could please mark this and hand it to the witness.

10:27:41 23 (Exhibit 170 was marked for identification.)

10:27:41 24 BY MR. HARVEY:

10:27:42 25 Q. This document is a PDF of the current bios of



12:28:20 1 drive that.

12:28:24 2 Q. But that included sourcing, correct?

12:28:26 3 A. It includes sourcing.

12:28:28 4 Q. The email continues, "However, we do need to be  
12:28:30 5 respectful" I'm sorry, "we do need to be respectfully  
12:28:33 6 and sensitive about how we do it. I don't think this is  
12:28:35 7 consistently happening. One practical suggestion that  
12:28:39 8 came up today that we can tell recruiters as a tangible  
12:28:41 9 action item "

12:28:43 10 MR. RUBIN: You might need to go a little  
12:28:45 11 slower for the court reporter, when you're reading.

12:28:52 12 THE REPORTER: It would be swell.

12:28:54 13 MR. HARVEY: I will be slower. Thank you.

12:28:56 14 Q. I'll start with, "However, we do need to be  
12:28:58 15 respectfully and sensitive about how we do it. I don't  
12:29:03 16 think this is consistently happening. One practical  
12:29:08 17 suggestion that came up today that we can tell recruiters  
12:29:11 18 as a tangible action item is to be targeted in proactive  
12:29:16 19 recruiting into these companies. In other words, we  
12:29:19 20 should not do what MS does," and I believe that's  
12:29:22 21 Microsoft, "which is get a Rolodex of engineers and just  
12:29:26 22 call everyone, one after another. It is fine for  
12:29:29 23 recruiters to call into these companies with a specific  
12:29:29 24 individual they're chasing."

12:29:32 25 Were let me pause here.

12:29:39 1 Was it your understanding that Google's  
12:29:42 2 recruiters were permitted to call into companies with a  
12:29:46 3 specific individual they were chasing?

12:29:50 4 A. So I this was a this was early on. I  
12:29:53 5 just I just got there, so I was just getting my  
12:29:56 6 footing. But historically, when I ran staffing  
12:30:00 7 organizations, recruiters of course used sourcing as one  
12:30:04 8 of the methodologies to go and get people.

12:30:07 9 Q. Okay. And then you responded, what looks like  
12:30:12 10 the next day, and you say, "There is definitely a side to  
12:30:18 11 recruiting that boasts a 'no holds barred' attitude when  
12:30:18 12 it comes to hunting for candidates." Is that the  
12:30:25 13 aggression that you were just referring to?

12:30:27 14 A. I said in the to me, aggressiveness is  
12:30:31 15 all the recruiters need to be unrelenting and make sure  
12:30:35 16 they hit their goals, because there was a lot of pressure  
12:30:38 17 on me and the staffing organization to hit our numbers,  
12:30:41 18 which we did.

12:30:42 19 And and and I don't I didn't want  
12:30:45 20 recruiters on the team that could not fulfill that. So  
12:30:48 21 we we really wanted strong a strong team, to be  
12:30:51 22 effective and productive.

12:30:54 23 Q. What kind of pressure did you receive to meet  
12:30:56 24 your goals?

12:30:58 25 A. The the company the the company had

12:31:02 1 I mentioned this before in testimony, where the company  
12:31:04 2 had a hiring plan, and and I'm personally, I'm a  
12:31:10 3 very achievement oriented person, and so you give me a  
12:31:14 4 plan and I will make sure that we as an organization will  
12:31:17 5 hit hit the numbers.

12:31:19 6 So so the pressure I felt was partially my  
12:31:25 7 own pressure to make sure we delivered, and also I wanted  
12:31:29 8 to make sure the company got the talent it needed to  
12:31:32 9 achieve. So each organization needed great talent, and I  
12:31:36 10 delivered.

12:31:37 11 Q. Did Shona Brown and Laszlo Bock make that  
12:31:40 12 clear, that that Google's expectation was that you  
12:31:43 13 would meet your goals?

12:31:45 14 A. Well, what they said to me, or what I perceived  
12:31:49 15 they said is, "Your job is to fill roles. Your job is to  
12:31:52 16 bring talent in, and that's that's that's your  
12:31:55 17 responsibility." And I was fully accountable for that  
12:32:00 18 and fully accountable to make sure that Google grew. And  
12:32:03 19 it was made very clear.

12:32:05 20 And Laszlo was not part of the picture at this  
12:32:08 21 point in time. He was hired after this. But Shona made  
12:32:12 22 it very clear for me that I was brought onboard to build  
12:32:15 23 an amazing talent organization, recruiting organization.

12:33:03 24 Q. When you were first hired at Google, or any  
12:33:05 25 time thereafter, did you ever have a discussion with

1 I, Rosalie A. Kramm, Certified Shorthand  
2 Reporter licensed in the State of California, License No.  
3 5469, hereby certify that the deponent was by me first  
4 duly sworn and the foregoing testimony was reported by me  
5 and was thereafter transcribed with computer aided  
6 transcription; that the foregoing is a full, complete,  
7 and true record of said proceedings.

8 I further certify that I am not of counsel or  
9 attorney for either of any of the parties in the  
10 foregoing proceeding and caption named or in any way  
11 interested in the outcome of the cause in said caption.

12 The dismantling, unsealing, or unbinding of the  
13 original transcript will render the reporter's  
14 certificates null and void.

15 In witness whereof, I have hereunto set my hand  
16 this day: August 24, 2012.

17 \_\_\_X\_\_\_ Reading and Signing was requested.

18 \_\_\_\_\_ Reading and Signing was waived.

19 \_\_\_\_\_ Reading and signing was not requested.

20

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\_\_\_\_\_  
ROSALIE A. KRAMM

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CSR 5469, RPR, CRR

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